

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No: 13-cr-20371  
Honorable Victoria A. Roberts

v.

DOREEN HENDRICKSON,

Defendant.

\_\_\_\_\_ /

**ORDER DENYING DEFENDANT'S REQUEST FOR STANDBY COUNSEL**  
**(Doc. # 113)**

On November 24, 2014 Defendant Doreen Hendrickson filed a request for appointment of new standby counsel. There is no constitutional right to standby counsel for *pro se* defendants. *United States v. Pacheco*, No. 07-CR-20546, 2013 WL 1976118, at \*9 (E.D. Mich. May 13, 2013); *United States v. Oliver*, 630 F.3d 397, 414 (5th Cir. 2011). Although a court may appoint standby counsel, there is no law that says a court must do so. *U.S. ex rel. Jordan v. Walls*, No. 02-C-2906, 2002 WL 1821743, at \*4 (N.D. Ill. Aug. 7, 2002). See also, *United States v. Matthews*, No. 3-01-CR-181-X, 2001 WL 1631508, at \*1 (N.D. Tex. Dec. 14, 2001) ([d]efendant's request for appointed "standby" counsel is denied—a defendant who has exercised his right to self-representation has no constitutional right to "standby" counsel.)(citations omitted). Absent a constitutional mandate, the Court **DENIES** Hendrickson's request.

**IT IS ORDERED.**

S/Victoria A. Roberts

Victoria A. Roberts

United States District Judge

Dated: December 3, 2014

The undersigned certifies that a copy of this document was served on the attorneys of record and Doreen Hendickson by electronic means or U.S. Mail on December 3, 2014.

s/Linda Vertriest

Deputy Clerk